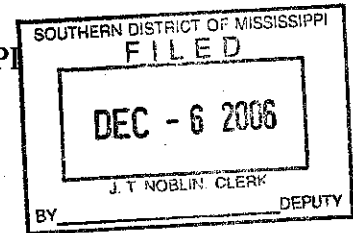


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO.

1:06CR120LG-JMR

PAUL BRUCE LADNER

18 U.S.C. § 287
18 U.S.C. § 641
18 U.S.C. § 1001
18 U.S.C. § 1343

The Grand Jury charges:

COUNT 1

On or about September 20, 2005, in Harrison County in the Southern Division of the Southern District of Mississippi and elsewhere, the defendant, **PAUL BRUCE LADNER**, aided and abetted by others known and unknown to the Grand Jury, made and presented to the Federal Emergency Management Agency a claim against the United States for payment, which he knew to be false, fictitious, and fraudulent, by filing a disaster assistance claim in which he represented that his primary residence was a house at 211 Michigan Avenue, Pass Christian, Mississippi, and that this home and personal property located therein sustained damage as a result of Hurricane Katrina.

In violation of Sections 287 and 2, Title 18, United States Code.

COUNT 2

On or about September 20, 2005, in Harrison County in the Southern Division of the Southern District of Mississippi and elsewhere, in a matter within the jurisdiction of the Federal Emergency Management Agency, an agency of the United States of America, the defendant, **PAUL BRUCE LADNER**, aided and abetted by others known and unknown to the Grand Jury, knowingly

and willfully made or caused to be made a false and fraudulent material statement or representation, in that the defendant filed a disaster assistance claim in which he represented that his primary residence was a home at 211 Michigan Avenue, Pass Christian, Mississippi, and that this house and personal property located therein sustained damage as a result of Hurricane Katrina, when in truth and in fact his primary residence at the time of Hurricane Katrina was not a home at 211 Michigan Avenue, Pass Christian, Mississippi.

In violation of Sections 1001 and 2, Title 18, United States Code.

COUNT 3

On or about September 20, 2005 through December 28, 2005, in Harrison County in the Southern Division of the Southern District of Mississippi and elsewhere, the defendant, **PAUL BRUCE LADNER**, aided and abetted by others known and unknown to the Grand Jury, did steal, purloin and knowingly convert to his own use or the use of another greater than \$1,000 in funds belonging to the United States of America by receiving Hurricane Katrina disaster relief benefits from the Federal Emergency Management Agency, such benefits being funded by the United States Department of Homeland Security, to which he knew he was not entitled.

In violation of Sections 641 and 2, Title 18 United States Code

COUNT 4-6

1. Beginning on or about September 20, 2005 through on or about December 28, 2005, in Harrison County in the Southern Division of the Southern District of Mississippi and elsewhere, the Defendant, **PAUL BRUCE LADNER**, aided and abetted by others known and unknown to the Grand Jury, intentionally devised and carried out a scheme to defraud the Federal Emergency Management Agency, an agency of the United States, and to obtain money and property by means of materially false and fraudulent representations, pretenses and promises, and in furtherance thereof

did cause to be transmitted in interstate commerce certain wire communications for the purpose of executing the scheme, and attempting to do so.

2. To accomplish his fraudulent purposes, from on or about September 20, 2005 through on or about December 28, 2005, the defendant, **PAUL BRUCE LADNER**, aided and abetted by others known and unknown to the Grand Jury, by means of materially false and fraudulent representations, pretenses and promises represented himself as being in need of, and eligible for, emergency housing and rental assistance from the Federal Emergency Management Agency.

3. On or about the dates set forth below, within the Southern District of Mississippi and elsewhere, the defendant, **PAUL BRUCE LADNER**, aided and abetted by others known and unknown to the Grand Jury, for the purpose of carrying out this scheme to defraud and attempting to do so, knowingly caused to be transmitted in interstate commerce, certain wire communications, that is certain writings, each item constituting a separate count herein as follows:

COUNT 4 - Electronic funds transfer, September 20, 2005, \$2,000.00.

COUNT 5 - Electronic funds transfer, October 15, 2005, \$2,358.00.

COUNT 6 - Electronic funds transfer, December 28, 2005, \$9,780.70.

All in violation of Sections 1343 and 2, Title 18, United States Code


for **DUNN LAMPTON**
United States Attorney

A TRUE BILL:

s/ Signature

Foreperson of the Grand Jury